

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

PENNANT MANAGEMENT, INC.)

Plaintiff,)

v.)

FIRST FARMERS FINANCIAL, LLC, NIKESH)
AJAY PATEL, TIMOTHY GLENN FISHER,)
TRISHA N. PATEL, ALENA HOSPITALITY,)
LLC, ALENA LABORATORIES, LLC,)
ALENA AVIATION, LLC, ABLE)
CONNECTION, LLC, NPSSS, LLC, KUBER)
CAPITAL FUNDING, LLC, KUBER)
CONSULTING, SURI HOSPITALITY, LLC,)
SURI HOSPITALITY INTERNATIONAL,)
LLC, TRANSLUCENT ENTERTAINMENT,)
LLC, ALENA PRODUCTION, LLC, and ASL)
PICTURES, LLC,)

Defendants)

Case No. 14-cv-7581

ILLINOIS METROPOLITAN INVESTMENT)
FUND, HARVARD SAVINGS BANK, an)
Illinois Savings Bank,)

Plaintiff-Intervenors,)

Hon. Amy J. St. Eve

v.)

FIRST FARMERS FINANCIAL, LLC, NIKESH)
AJAY PATEL, TIMOTHY GLENN FISHER,)
TRISHA N. PATEL, ALENA HOSPITALITY,)
LLC, ALENA LABORATORIES, LLC,)
ALENA AVIATION, LLC, ABLE)
CONNECTION, LLC, NPSSS, LLC, KUBER)
CAPITAL FUNDING, LLC, KUBER)
CONSULTING, SURI HOSPITALITY, LLC,)
SURI HOSPITALITY INTERNATIONAL,)
LLC, TRANSLUCENT ENTERTAINMENT,)
LLC, ALENA PRODUCTION, LLC, ASL)
PICTURES, LLC, ALENA HOSPITALITY)
LBV, LLC, ALENA HOSPITALITY UCF, LLC,)

ALENA HOSPITALITY SSL, LLC, 500)
HAMILTON PEORIA, LLC, and ALENA)
HOSPITALITY SADDLE BROOK, LLC,)
)
Defendants)

**DEFENDANT TRISHA PATEL'S MOTION TO JOIN AND
FOR AN EXTENSION OF TIME TO ANSWER THE COMPLAINT BY THE
OVERALL RECEIVER**

Defendant Trisha Patel, through her attorneys, respectfully moves this Court to Join the Motion for Extension of Time filed by Defendant Nikesh Patel and for an extension of time to answer or otherwise plead to the Amended Complaint filed by the Overall Receiver. In support of her motion, Trisha Patel states as follows:

1. Plaintiff Pennant Management, Inc. filed its Second Amended Complaint on July 8, 2015.
2. Plaintiff-Intervenor Illinois Metropolitan Investment Fund ("IMET") filed its Amended Complaint on July 7, 2015.
3. Plaintiff-Intervenor Harvard Savings Bank filed its Amended Complaint on July 10, 2015.
4. The Overall Receiver filed an Amended Complaint against Trisha Patel on July 14, 2015.
5. On July 9, 2015, this Court established a deadline of August 21, 2015 for Nikesh Patel and Trisha Patel to answer or otherwise plead.
6. On August 21, 2015, counsel for Defendant Nikesh Patel filed a Motion for an Extension of Time to answer or otherwise plead with respect to the complaints referenced above in paragraphs one through three. (hereinafter, the "Nikesh Patel Motion"). [Doc. 356].

7. The Nikesh Patel Motion requests a 30-day extension of time, up to and including September 21, 2015, to answer or otherwise plead with regard to the pending complaints filed by Plaintiff Pennant Management, Inc., Plaintiff-Intervenor IMET as well as Plaintiff-Intervenor Harvard Savings Bank.

8. Counsel for Trisha Patel is coordinating with counsel for Nikesh Patel in this matter and respectfully requests to join the Nikesh Patel Motion.

9. Additionally, as Trisha Patel is named as a defendant in a separate complaint filed by the Overall Receiver, Trisha Patel requests a 30-day extension with respect to the pleading by the Overall Receiver.

10. Counsel for Trisha Patel has contacted counsel for the Overall Receiver, who has no objection.

11. Trisha Patel's request is timely, made in good faith, and is not made for the purpose of delaying these proceedings, unfairly prejudicing any party, or interfering with this Court's docket.

12. While counsel for Trisha Patel did not reach counsel for Pennant Management, Inc. and Harvard Savings Bank, neither opposes the Nikesh Patel Motion, and, as such counsel for Trisha Patel has no reason to believe that they will object to Trisha Patel's Motion to Join. Neither counsel for Trisha Patel nor counsel for Nikesh Patel was able to reach counsel for IMET.

WHEREFORE, for the foregoing reasons, Trisha Patel respectfully requests that this Court enter an Order allowing her to join Nikesh Patel's Motion for an Extension of Time, and providing that Defendant Trisha Patel's response to the pending complaints be filed on or before September 21, 2015.

Dated: August 21, 2015

Respectfully submitted,

Trisha Patel

By: /s/ V. Brette Bensinger
One of her attorneys

Sergio Acosta
V. Brette Bensinger
James Vlahakis
HINSHAW & CULBERTSON LLP
222 N. LaSalle Street, Suite 300
Chicago, IL 60601
(312) 704-3000